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Attorneys for Plaintiff,

**JEFFREY N. YOUNG**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

JEFFREY N. YOUNG, an  
individual,

Plaintiff,

vs.

CITY OF MENIFEE, a public entity;  
COUNTY OF RIVERSIDE, a  
public entity; RIVERSIDE  
COUNTY SHERIFF'S  
DEPARTMENT, a public entity;  
SCOTT STOLL, an individual;  
DOUGLAS TODD, an individual;  
NICOLE RODEROS, an individual;  
BRIAN REMINGTON, an  
individual; AND DOES 1 through  
10, inclusive,

Defendants.

CASE NO. 5:17-cv-1630-JGB (SPx)

JUDGE: Hon. Jesus G. Bernal

**DECLARATION OF DANIEL M.  
JOSEPHSON, ESQ. RE: PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

*[Opposition to Motion for Summary  
Judgment/Partial Summary Judgment;  
Declaration of Jeffrey Young; Statement of  
Genuine Disputes of Material Fact; Plaintiff's  
Compendium of Exhibits; Notice of Manual  
Filing; and [Proposed] Order filed concurrently  
herewith]*

Hearing: August 28, 2023

Time: 9:00 a. m.

Courtroom: 1

Complaint Filed: August 11, 2017

Trial Date: November 7, 2023

**DECLARATION OF ATTORNEY DANIEL M. JOSEPHSON, ESQ.**

I, Daniel M. Josephson, declare the following:

1. I am an Of Counsel attorney with the law firm of Siddiqui Law, APC, attorneys of record for Plaintiff JEFFREY N. YOUNG (“YOUNG” or “Plaintiff”) in this action. I have personal knowledge of the facts in this declaration and if called upon as a witness I could and would competently testify to the following facts based upon my own personal knowledge.

2. This declaration is submitted in support of Plaintiff’s Opposition to the Motion for Summary Judgment/Partial Summary Judgment of Defendants CITY OF MENIFEE (“CITY”) and SCOTT STOLL (“STOLL”) (collectively, “Defendants”).

3. On December 8, 2020, Defendant COUNTY OF RIVERSIDE (the “COUNTY”) took the deposition of Plaintiff YOUNG, but it was not completed. The COUNTY has yet to reschedule or notice Plaintiff’s continued deposition. True and correct copies of excerpts from the deposition of Plaintiff YOUNG, and the relevant exhibits referenced therein, are attached hereto as **Exhibit “A”** to Plaintiff’s Compendium of Exhibits.

4. On December 6, 2022, Defendant the CITY took the deposition of Elizabeth Young. True and correct copies of excerpts from Mrs. Young’s deposition are attached as **Exhibit “B”** to Plaintiff’s Compendium of Exhibits.

5. On August 3, 2021, the deposition of Craig Carlson, Building Official for the City of Menifee, was taken (as a percipient witness). True and correct copies of excerpts from Mr. Carlson’s deposition are attached as **Exhibit “C”** to Plaintiff’s Compendium of Exhibits.

6. On August 3, 2021, the deposition of Donna Burks, Code Enforcement Officer for the City of Menifee, was taken (as a percipient witness). True and correct copies of excerpts from Mr. Carlson’s deposition are attached as **Exhibit “D”** to Plaintiff’s Compendium of Exhibits.

7. On February 6, 2023, the deposition of Defendant BRIAN REMINGTON

1 was taken. True and correct copies of excerpts from the deposition, and the relevant  
2 exhibits referenced therein, are attached as **Exhibit “E”** to Plaintiff’s Compendium of  
3 Exhibits.

4 8. On June 22, 2023 the deposition of Defendant the CITY’s Persons Most  
5 Knowledgeable, Craig Carlson and Natalie Jacobs, were taken. True and correct  
6 copies of excerpts from the COUNTY’s June 22, 2023 FRCP 30(b)(6) deposition,  
7 and the relevant exhibits referenced therein, are attached as **Exhibits “F”** and **“G”** to  
8 Plaintiff’s Compendium of Exhibits.

9 9. On June 3, 2020, Loma Linda Medical Center produced documents  
10 responsive to a subpoena served by Defendant STOLL. A true and correct copy of the  
11 documents produced by Loma Linda Medical Center are attached hereto as **Exhibit**  
12 **“H.”**

13 10. On June 23, 2021, Defendants produced documents responsive to  
14 Plaintiff’s Requests for Production of Documents (Set One), including the following:

15 a. Photographs of Plaintiff YOUNG produced by the COUNTY  
16 (COR00018-00021). True and correct copies of said photographs are  
17 attached as **Exhibit “I”** to Plaintiff’s Compendium of Exhibits.

18 b. Incident Report prepared by Defendant REMINGTON produced by the  
19 COUNTY (COR00001-00007). A true and correct copy of the Incident  
20 Report is attached as **Exhibit “J”** to Plaintiff’s Compendium of  
21 Exhibits.

22 c. Photographs of Plaintiff YOUNG’s vehicle and Defendant STOLL’s  
23 vehicles produced by the COUNTY (COR00015-00017). True and  
24 correct copies of said photographs are attached as **Exhibit “K”** to  
25 Plaintiff’s Compendium of Exhibits.

26 d. Audio Recording of Defendant REMINGTON’s witness interview with  
27 Linda Lewis, dated October 7, 2016 (COR0080). A true and correct  
28 copy of the Recording has been manually filed with the Court as **Exhibit**

**“L.”** (*See* Plaintiff’s Notice of Manual Filing.)

e. Audio Recording of Deputy REMINGTON's Interview with Plaintiff YOUNG at the Perris Sherriff's Station, dated October 7, 2016 (COR0083.) A true and correct copy of the Recording has been manually filed with the Court as **Exhibit "N."** (*See* Plaintiff's Notice of Manual Filing.)

11. A true and correct copy of the Declaration of Plaintiff JEFFREY YOUNG, filed on or about February 24, 2023 [Dkt. # 127], is attached as **Exhibit “M”** to Plaintiff’s Compendium of Exhibits.

12. On July 7, 2023, the Deposition of Defendant STOLL was taken. True and correct copies of excerpts from the deposition, and the relevant exhibits referenced therein, are attached as **Exhibit “Q”** to Plaintiff’s Compendium of Exhibits.

13. Despite the fact that Plaintiff's deposition has not been completed, Plaintiff respectfully requests the Court DENY the Motion in its entirety or, alternatively, defer considering the Motion pending the completion of this necessary discovery.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 7th day of August, 2023, at Costa Mesa, California.

/s/ Daniel M. Josephson /  
Declarant, Daniel M. Josephson, Esq.